

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

Courtney Boyd
Plaintiff

Vs.

2:06-CV-511-WKW

DR. DARBOUZE, et al.,
Defendants

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JERRA G. HARRIS, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

MOTION FOR NOTIFY TO THE COURT OF
THE NEED FOR INTERROGATIES PRIOR TO SPECIAL REPORT

Comes Now, The Plaintiff, Courtney Boyd, moves into this Honorable Court Pro/Se Pursuant to Rule 26 & 33 FED.R.CIV.PROC., and authority herein files and present, his interrogaties direct at Defendant Jean Darbouze, who should answer these interrogaties under oath within (20) days of receiving them:

INTERROGATIES

1. List your full name and your home address?
2. How old are you?
3. How long have you been a resident of Alabama?
4. List your complete educational background, including any special classes you partiscipated in?
5. How long have you been employed by Prison Health Care Service?
6. Have you ever been arrested for any thing prior to your employment within the Prison Health Care Service?
7. If the answer to interr. No.6 Supra is yes,
(A). State when each arrest occurred.

(B). For what reason.

(C)What was the outcome.

8. Have you ever has a serious complaint or just a complaint filed against you by any other inmate since your employment within the Prison Health Care Service?

If the answer is yes, list,

(A)When the complaint was filed.

(B) By Whom.

(C). List what happen to them.

(D) Produce a clear copy of every one of them.

9. Did you tell the plaintiff that his back should be well after three years?

10. Did you tell the plaintiff that you don't find it medical necessary for him to have an no long standing profile.

11. Did you tell the plaintiff that you was not going to write him a another profile and you was going to take back to one you gave him?

12. Did you tell the plaintiff that you were not going to rewrite his back brack and botton bed profile?

WHEREFORE, The Plaintiff prays that the defendant will answer this interrogatories within (20) days of receiving it.

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the Defendant by placing it into the Easterling Corr.Fac. Mail Box on July 26, 2006.


Courtney Boyd